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10 *Attorneys for Defendants Thomson
Consumer Electronics, Inc. and Thomson SA*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

15 IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION.

No. 07-cv-5944-SC
MDL No. 1917

17 || This Document Relates to:

Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust v. Technicolor SA et al. No. 13-cv-05261-

22 *Best Buy Co., Inc., et al. v. Technicolor SA,
et al., No. 13-cv-05264:*

24 | *Interbond Corporation of America v. Technicolor SA, et al., No. 13-cv-05727;*

Office Depot, Inc. v. Technicolor SA, et al.,
No. 13-cv-05726;

*Costco Wholesale Corporation v.
Technicolor SA, et al., No. 13-cv-05723;*

**DECLARATION OF JEFFREY S.
ROBERTS IN SUPPORT OF THOMSON
SA'S RESPONSE TO THE SHARP
PLAINTIFFS' STATEMENT
REGARDING PENDING DISCOVERY
MOTIONS**

Judge: Hon. Samuel Conti

DECLARATION OF JEFFREY S. ROBERTS IN
SUPPORT OF THOMSON SA'S RESPONSE TO
SHARP'S STATEMENT

No. 07-5944-SC: MDL No. 1917

1
2 *P.C. Richard & Son Long Island*
3 *Corporation, et al. v. Technicolor SA, et al.,*
4 *No. 31:cv-05725;*

5 *Schultze Agency Services, LLC, o/b/o*
6 *Tweeter Opco, LLC, et al. v. Technicolor SA,*
7 *Ltd., et al., No. 13-cv-05668;*

8 *Sears, Roebuck and Co. and Kmart Corp. v.*
9 *Technicolor SA, No. 3:13-cv-05262;*

10 *Target Corp. v. Technicolor SA, et al., No.*
11 *13-cv-05686*

12 *Tech Data Corp., et al. v. Hitachi, Ltd., et*
13 *al., No. 13-cv-00157*

14 *Dell Inc. v. Hitachi Ltd.,*
15 *No. 13-cv-02171;*

16 *Sharp Electronics Corp., et al. v. Hitachi,*
17 *Ltd., et. al., No. 13-cv-01173*

18 *ViewSonic Corporation v. Chunghwa Corp.,*
19 *et al., No. 14-cv-02510*

20 I, Jeffrey S. Roberts, hereby declare as follows:

21 1. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel
22 for Defendants, Technicolor SA (f/k/a Thomson SA). I am an active member in good standing of
23 the bars of the State of Colorado and am admitted to practice *pro hac vice* before the United
24 States District Court for the Northern District of California. I make this declaration in support of
25 Thomson SA's Response to the Sharp Plaintiffs' Statement Regarding Pending Discovery
26 Motions. The statements contained in this declaration are based on my personal knowledge and,
27 if called as a witness, I could competently testify to the following facts.

28 2. In May 2014, I spoke with Agnés Martin, Didier Trutt, and Emeric Charamel.
29 None of them are currently employed by Technicolor SA or any subsidiary or affiliate, and each
30 stated that he or she would not willingly sit for a deposition in this case. Others at Thomson SA
31 have also discussed this issue Martin, Trutt and Charamel and have received the same response.

3. Technicolor SA and its counsel do not have current contact information for Christian Lissorgues despite having attempted to secure it and have not been able to speak with him regarding this case.

4. Attached hereto as Exhibit A is a true and correct copy of the April 18, 2014 e-mail from Kathy Osborn to counsel for Sharp and liaison counsel for DAPs.

5. Attached hereto as Exhibit B is a true and correct copy of the October 24, 2014 e-mail from Kathy Osborn to counsel for Sharp.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed this 29th day of October 2014, at Denver, Colorado.

/s/ Jeffrey S. Roberts